

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK (WHITE PLAINS)**

TRANSEO S.A.R.L. and PHILIPPE
GELBLAT,

Plaintiffs,

v.

BESSEMER VENTURE PARTNERS VI L.P.,
BESSEMER VENTURE PARTNERS VI
INSTITUTIONAL L.P., AND BESSEMER
VENTURE PARTNERS CO-INVESTMENT
L.P.,

Defendants.

11 Civ. 5331 (CS) (PED)

ECF Case

**NOTICE OF MOTION IN SUPPORT
OF DEFENDANTS' MOTION TO
DISMISS PLAINTIFFS' SECOND
AMENDED VERIFIED COMPLAINT**

PLEASE TAKE NOTICE that, upon the Declaration of Hilary R. Ormond, dated June 13, 2012, and the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss Plaintiffs' Second Amended Verified Complaint, dated June 13, 2012, the undersigned will move in the United States District Court for the Southern District of New York (White Plains), before the Honorable Cathy Seibel, United States District Court Southern District of New York, the Honorable Charles L. Brieant Jr. Federal Building and Courthouse, 300 Quarropas Street, White Plains, New York 10601-4150, on a date to be determined by the Court, for an Order granting Defendants' Motion to Dismiss pursuant to Rules 12(b)(1), 12(b)(6) and 23.1 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the governing scheduling order, any responsive papers are due on or before July 13, 2012, and reply papers are due on or before July 27, 2012.

Dated: June 13, 2012

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By Hilary R. Ormond

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Attorneys for Nominal Defendant

Neutral Holdings, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2012, I electronically filed the Defendants' Notice of Motion to Dismiss Plaintiffs' Second Amended Verified Complaint, Defendants' Memorandum of Law in support of their Motion to Dismiss Plaintiffs' Second Amended Verified Complaint, the Declaration of Hilary R. Ormond in support of the Motion to Dismiss Plaintiffs' Second Amended Verified Complaint, and Defendants' Reply Memorandum of Law in support of the Motion to Dismiss Plaintiffs' Second Amended Verified Complaint., in *Transeo S.A.R.L. and Philippe Gelblat v. Bessemer Venture Partners VI L.P., et al.*, 11 CV 5331 (CS) (PED), with the Clerk of Court using the CM/ECF system, which will forward notification of such filing to the following counsel of record:

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